



# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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June 28, 1999

HAND DELIVERED

Ron Ryan  
SF Phosphates LTD  
9401 North Highway 191  
Vernal, Utah 84078-7802

Re: Release of Reclaimed Areas, SF Phosphates LTD., Vernal Phosphate Operations,  
M/047/007, Uintah County, Utah

Dear Mr. Ryan:

In reviewing our files it was discovered that the Division failed to formally acknowledge the release of reclaimed areas examined during the June 29, 1998 site inspection. The inspection is documented in a memo dated August 3, 1998. The purpose of this letter is to document those areas examined during that inspection which have successfully been revegetated and can be fully released.

The areas described below are identified by using the acreage number and reclamation year shown on the site map from the annual report for year 1997. The **35 acre** and **20 acre** blocks reclaimed in Panel C in 1993 are now fully released. The **76.7 acre** block in Panel C reclaimed in 1995 is fully released. The blocks of **11 acres**, **15 acres** and **0.7 acres** in Panel B reclaimed in 1995 are fully released. The **4.9 acre** block reclaimed in 1995 is fully released. The 5 acre block reclaimed in 1993 **cannot be released** at this time because the vegetation did not meet the success standard. The total surface area reclaimed and fully released associated with the June 29, 1998 inspection is 163.3 acres.

Attached is a copy of the April 28, 1995 seedmix recommended by the Division for reclamation of SF's mining areas. This seedmix should provide a more diverse stand of vegetation while providing forage for wildlife. Please utilize this seedmix in future revegetation of the mined out areas.

In an effort to track the reclamation at the Vernal Phosphate Mine, the Division has prepared an acreage balance sheet. A copy of this draft balance sheet showing acreage bonded, reclaimed and released for the years 1994 through 1998 is attached. According to this draft

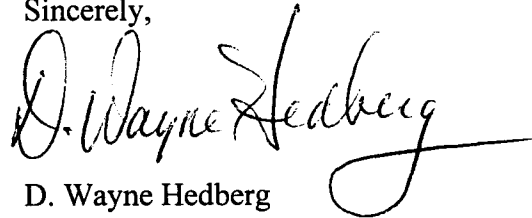
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balance sheet there is currently a net positive balance of reclaimed area over disturbed area. Please review these figures for accuracy and notify the Division of any errors.

The existing reclamation surety estimate was due for a standard five year review in 1998. Given the current excess of bonded acreage and the recent submission of the tailings expansion revision, it would seem more appropriate to review the existing reclamation surety estimate once, as part of the surety review for the tailings expansion. Please notify us of any concerns SF may have with combining this reclamation estimate review with the tailings expansion revision review.

We apologize for the delay in formally releasing the reclaimed and inspected areas. Please contact me at (801) 538-5286, or Tony Gallegos at (801) 538-5267 if you have any questions regarding this letter.

Sincerely,

A handwritten signature in black ink that reads "D. Wayne Hedberg". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

D. Wayne Hedberg  
Permit Supervisor  
Minerals Regulatory Program

jb

Attachments: 4/28/95 Seedmix, Draft Acreage Balance Sheet 6/28/99  
m47-07rl.let

Recommended Revegetation Species List  
for

SF Phosphates, Inc.  
Vernal Phosphate Mine  
M/047/007

Prepared by DOGM April 28, 1995

*For final reclamation - all areas except tailings pond*

<u>Common Name</u>	<u>Species Name</u>	<u>*Rate lbs/ac (PLS)</u>
'Hycrest' crested wheatgrass	<u>Agropyron cristatum 'Hycrest'</u>	0.5
Intermediate wheatgrass	<u>Agropyron intermedium</u>	1.0
Orchard Grass	<u>Dactylis glomerata</u>	0.5
Basin Wildrye	<u>Elymus cinereus</u>	1.5
Indian ricegrass	<u>Oryzopsis hymenoides</u>	1.5
Ladac Alfalfa	<u>Medicago sativa</u>	1.0
Yellow sweetclover	<u>Melilotus officinalis</u>	0.5
Palmer penstemon	<u>Penstemon palmeri</u>	0.5
Small burnet	<u>Sanguisorba minor</u>	1.5
Mountain big sagebrush	<u>Artemisia tridentata vaseyana</u>	0.1
Wyoming big sagebrush	<u>Artemisia tridentata wyomingensis</u>	0.1
4-Wing Saltbush	<u>Atriplex canescens</u>	1.0
Rubber rabbitbrush	<u>Chrysothamnus nauseosus</u>	0.25
Forage kochia	<u>Kochia prostrata</u>	0.5
Bitterbrush	<u>Purshia tridentata</u>	1.0
Total		11.45 lbs/ac

*\*This the recommended drill seeding rate.*

*If the species are to be broadcast seeded, increase the rate by 50%.*

*For topsoil pile stabilization and other temporary revegetation areas*

<u>Common Name</u>	<u>Species Name</u>	<u>Rate lbs/ac (PLS)</u>
Annual barley or rye		8.0
Ladac Alfalfa	<u>Medicago sativa</u>	2.0
Yellow sweetclover	<u>Melilotus officinalis</u>	2.0
Total		12.0 lbs/ac

ACREAGE BALANCE SHEET																			DRAFT	
M/047/007																			last rev 00/28/99	
VERNAL PHOSPHATE OPERATIONS - SF PHOSPHATES, Ltd.																			filename m47-07.ar.wb3	
-Current reclamation surety is a surety bond for \$2,024,000 in year 1998-\$ for 861.7 acres of disturbance																				
-SF Phosphates is to maintain a balance of 861.7 acres of disturbance by performing concurrent reclamation																				
-Panels are separated by drainages: Hole In the Wall Canyon between Panel B & C; Brush Creek between Panel A & B																				
-The column "DISTURB" represents the amount of new disturbance associated with new areas being mined that year																				
-The column "RECLAIM" represents the amount of disturbance reclaimed by SF that year according to annual reports & report maps																				
-The column "RELEASE" represents the amount of disturbance formally released by the Division that year																				
-The row "BALANCE" at the bottom represents the bonded acreage of 861.7 plus new disturbance less released acreage																				
FEATURE ID	AT TRANSFER	DISTURB 1994	RECLAIM 1994	RELEASE 1994	DISTURB 1995	RECLAIM 1995	RELEASE 1995	DISTURB 1996	RECLAIM 1996	RELEASE 1996	DISTURB 1997	RECLAIM 1997	RELEASE 1997	DISTURB 1998	RECLAIM 1998	RELEASE 1998	DISTURB 1999	RECLAIM 1999	RELEASE 1999	
PANEL B		19	41.1	6.6				66	48.2		92.7	66		68.7	55.3	28.7				
PANEL C		118	18	50		76.7									10	131.7				
PANEL D		80				4.9	178.5									4.9				
PANEL 1		0																		
FUTURE MINE-UNK		180																		
SAG MILL & SHOP		21.2																		
PLANT FACILITIES		24																		
UNPAVED ROADS		18																		
PAVED ROADS		11																		
TAILINGS - MISC.		43		15																
TAILINGS POND		345																		
PIPELINE		2.5																		
TOTALS		861.7	59.1	71.6	0	0	81.6	178.5	66	48.2	0	92.7	66	0	68.7	65.3	163.3	0	0	
BALANCE																				